

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

V.

JOSE LUIS TREJO

§
§
§
§
§

Cr. No. 7:20-cr-01676-1

**DEFENDANT’S UNOPPOSED MOTION FOR CONTINUANCE ON FINAL PRETRIAL
CONFERENCE AND JURY SELECTION**

JOSE LUIS TREJO, through his attorney, Alejandro Ballesteros, respectfully files this Motion to Continue Final Pretrial Conference and Jury Selection for the following reasons:

I.

The case is scheduled for a Final Pretrial Conference on Friday, June 4th, 2021 at 9:00am, and Jury Selection on Tuesday, June 8th, 2021 at 9:30am.

II.

Undersigned counsel is respectfully requesting additional time to confer with Assistant U.S Attorney and review further discovery in preparation for trial. Further, if the court could add a Motions Hearing 30 days prior to trial.

III.

Counsel for the Government, AUSA Roberto Lopez, Jr., was consulted regarding this motion and he is in unopposed.

IV.

This Motion is not made for delay. Defendant requests a continuance in order to exercise the right to effective assistance of counsel as guaranteed by the 6th Amendment to the United States Constitution.

V.

WHEREFORE, for the reasons set forth above, Mr. Trejo, through his attorney, Alejandro Ballesteros, respectfully request this honorable Court to continue this case and reset the Final Pretrial Conference and Jury selection.

Respectfully submitted,

/s/Alejandro Ballesteros
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Certificate of Service

On May 24, 2021 this unopposed motion was filed via ECF and served upon Assistant U.S. Attorney, Roberto Lopez, Jr.

/s/Alejandro Ballesteros
Alejandro Ballesteros

Certificate of Conference

On May 17, 2021, Assistant U.S. Attorney for the McAllen Office of the Southern District of Texas, Mr. Roberto Lopez, Jr., was consulted and is not opposed to this motion.

/s/Alejandro Ballesteros
Alejandro Ballesteros